

Village of Ardsley

Mayor
JAY S. LEON



Village Manager
GEORGE F. CALVI

Trustees
PETER R. PORCINO, Deputy Mayor
LARRY J. NARDECCHIA, JR.
GARY J. MALONE
BEVERLY A. LEVINE

507 Ashford Avenue
Ardsley, New York 10502
(914) 693-1550
Fax (914) 693-3706
www.ardsleyvillage.com

Village Treasurer
MARION DE MAIO

Village Clerk
BARBARA A. BERARDI

April 6, 2011

Village of Dobbs Ferry
112 Main Street
Dobbs Ferry, New York 10522
Attn: Hon. Hartley Connett, Mayor, & Village Board of Trustees

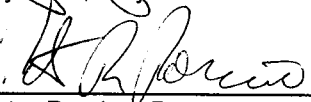
Dear Mayor Connett and Village Trustees:

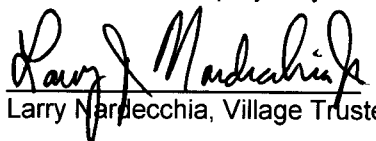
We have reviewed the draft scoping document for Rivertowns Square. We are enclosing a list of additional inquiries that the developers of Rivertowns Square need to address in the environmental review process. While some of the topics were addressed in the initial draft scoping document, we believe it is in everyone's interest that the document specify in greater detail the real concerns of the surrounding communities.

We request that each of the topics be specifically addressed and that if the developer does not intend to consider a topic it state its reasons why it will not be doing so.

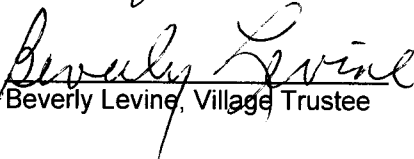
Respectfully,


Jay Leon, Mayor


Peter Porcino, Deputy Mayor


Larry Nardecchia, Village Trustee


Gary Malone, Village Trustee


Beverly Levine, Village Trustee

VILLAGE OF ARDSLEY

507 Ashford Avenue
Ardsley, NY 10502

April 4, 2011

PROPOSED AREAS OF INQUIRY FOR ADDITION TO 3/11/11 DRAFT SCOPING DOCUMENT FOR RIVERTOWNS SQUARE PROPOSAL

General Comment on Environmental Impacts (Section V)

The Rivertowns Square project's useful life can certainly be estimated at 50 years or more. The Environmental Impact Study should determine the long-term environmental impacts on the surrounding areas and ecology. The study cannot stop short by examining existing conditions, but should examine long-term deterioration likely to result over the life of the project.

Examination of Traffic and Parking (Section V (F))

The following intersections should be added to the list of intersections to be studied:

- Jackson and Old Sprain Rd (South)
- 9A and NYS Thruway exit 7A
- 9A and Bridge Street/Ridge Rd
- 9A and Center St.
- 9A and Heatherdell Rd
- Ashford and American Legion Drive
- Ashford and Park Ave
- Ashford and Washington Avenue
- Lawrence Street and South County Trailway (effects on and added risks to foot and bicycle traffic crossing Lawrence Street)

For all intersections (above and those set out in the draft scoping document):

-Due to the proximity of the Saw Mill River Parkway and its ban on commercial vehicles, commercial traffic counts should be taken at all listed intersections and examined both separately and in addition to total traffic counts, so that truck traffic patterns can be discerned and its impacts on local streets and 9A traffic flows can be assessed.

-Determine the specific traffic impacts of added schoolchildren: determine the anticipated number of children driving to and from or being driven to or from school, in addition to added buses, determine the added trips for activities before and after school, and determine the added trips for use of other Ardsley facilities by schoolchildren.

-Determine the traffic impacts if New York State DOT fails to fund upgrades to neighboring state roads, or refuses to permit any proposed upgrades on state roads.

VILLAGE OF ARDSLEY

-The traffic study should examine traffic spikes, not just peak hour average estimates, to assess the impacts of bunching of traffic due both to random distribution patterns (example: if 900 cars are projected during a peak morning rush hour, the traffic may not be distributed evenly over 60 minutes, but more heavily in a half hour period, so that 600 cars could be anticipated during a half hour period), and to outlier data (example: accumulated traffic in a pre-holiday rush, e.g., the Tuesday before Thanksgiving, where traffic volumes would be expected to spike with a confluence of shoppers, residents and restaurant patrons). In other words, the study should examine foreseeable worst case scenarios, and not just rely on averages or what may prove to be understated numbers.

-Set forth the current traffic cycles for eastbound cars at the Saw Mill Parkway/Lawrence Street intersection. Determine the number of cars expected to stack at the intersection, identify specifically where they will stack, determine how many cars are expected to clear in any given cycle and what accumulations can be expected to the extent the cars do not clear. Provide the same analysis for the westbound traffic at Lawrence Street and the Saw Mill River Parkway.

-The Saw Mill River Parkway has repeatedly flooded at this location (twice in the last couple of weeks). Examine the effects, including traffic impacts, when the Saw Mill River Parkway floods, the effects on commercial traffic and the effects on emergency vehicles.

-Examine the potentials for increased delays for ambulances traversing the Ashford Avenue Bridge as a result of the project, and further examine the delays while the Bridge experiences closures for reconstruction.

-The proposal contains a significant residential component; there are potentially high levels of traffic volumes created by the proposed retail uses, yet there are limited routes of egress. The DEIS should consider the need for an emergency evacuation of the premises. How will residents and shoppers be moved from the site in an emergency? Assess the effects of the proximity to Indian Point in the context of applicable emergency preparedness plans, and how that is affected by the project.

-Determine the effects of closures or partial closures of the Ashford Avenue Bridge for repairs, currently projected for 2014. Note that the construction periods are inconsistent in the developer's submissions to the Village. There should be a clear timeline for estimated construction to determine when the major impacts will occur.

-Determine the need for added public transportation, showing possible routes and costs, and assess the likelihood that public funds will be available to meet the public transportation needs, given the current tax burdens and limitations on tax increases. Determine whether Dobbs Ferry should provide public transportation, such as shuttle buses, and assess the cost.

-Assess the effect of the project on parking availability at the Dobbs Ferry train station. Determine the impacts on the arrangement between Dobbs Ferry and Ardsley to allow a certain number of Ardsley residents to use the train station parking lot for commuting.

VILLAGE OF ARDSLEY

Air Quality (Section V)

-The scoping document should examine air quality issues, raised by increased traffic as well as greater land impacts and use of environmental resources.

Socioeconomic Impacts (Section V (I))

Add to the proposed areas of socioeconomic study:

- Ardsley historically provides recreational services to the schoolchildren, parents of schoolchildren and seniors residing within the school district, but outside the incorporated Village. Determine the financial impacts on the Ardsley Recreation Department and Ardsley's public facilities.

- Determine the impacts on Ardsley's and Dobbs Ferry's downtown merchants, including anticipated effects on DeCicco's and Stop and Shop; and the impacts if these merchants close as a result of the project, including the effects on other merchants.

- Determine the added costs to Ardsley due to increase in Rivertowns Square traffic within the Village, including potentials for added street repair, traffic enforcement, and remediation efforts.

- Assess the burdens on emergency services in Dobbs Ferry and Ardsley, and specifically, any increased reliance on Ardsley's ambulance corps, fire department and police department. Include a count of recent historic events in Dobbs Ferry requiring coverage of Ardsley services. Also include an assessment of the current membership of the Dobbs Ferry ambulance corps and its ability to attract volunteers in the future, and determine the effects on the Ardsley volunteer ambulance corps in the event the Dobbs Ferry ambulance corps experiences a drop-off in its ability to respond to emergencies.

-Assess potential for increased crime in Ardsley, and the effect on Ardsley police.

- Determine the effects on property values in Ardsley and Dobbs Ferry, including existing townhouse communities such as Walden Woods, Hunter's Run, Stonegate, Boulder Ridge and Ardsley Condominiums, arising from 220 units in Rivertowns Square added to the 1200+ other new units now under construction or proposed for the area.

Land Use (Section V (A))

-Expand the scoping to include the impacts of major projects in the area to include Austin Avenue, the Ginsburg proposal on 9A just south of Lawrence Street (currently entitled Saw Mill River Lofts), Ridge Hill (under construction) and Gel-Sprain. The Ardsley Park office facility on Route 9A south of Lawrence Street is not currently at full capacity. Factor in the impacts when this facility is fully rented.

-Since it is the nearest currently vacant lot of significance, the former chemical plant on Lawrence Street, east of the Saw Mill Parkway, must be examined for current zoning and

VILLAGE OF ARDSLEY

potential uses; assess the possibility of zoning changes and potential development on the site, and examine the impacts.

- As noted elsewhere, the impacts of these projects should include the effect on the Ardsley School District as all, except the Austin Avenue project, are located in the Ardsley School District.

Soils, Topography, Geology, Etc. (Section V (B))

- A complete UT (underground tank) inventory of the entire site, including tanks of all sizes (without limit), should be prepared. This should include condition of existing tanks, detailed plans for how tanks will be removed, site testing needed, and costs associated with all of the aforementioned.

- A search for all existing, "open" USEPA and NYSDEC citations should be conducted. All violations should be listed and methods for rectifying the violations should be set forth. Cost estimates of the work should be included.

- A complete assessment of existing conditions in all buildings which housed Research Laboratories, including the Research Lab building immediately to the west of Chauncey Square (Sports Club/retail shops) and the "High Pressure" Lab, located in the northwest corner of the northernmost parking lot.

-Inventory and identify any remaining chemical and radioactive stores, identify the location and condition of the fume hood and exhaust systems, examine basement facilities beneath each building, and locate and assess previous and existing waste storage areas. A cost estimate of appropriate Hazardous Building demolition should be obtained. A list of demolition techniques required and licensed contractors should be prepared. The impact on existing neighboring businesses (Chauncey Square) should be assessed, including any anticipated down time required during the demolition of the Hazardous Buildings.

-A record of soil testing conducted anywhere on site within the last 5 years should be made available. Soil testing should be newly performed prior to any excavation, including at the sites of the west Research Lab building and the High Pressure Lab building. Soil and site testing should include detection of all possible radioisotopes used in conjunction with research projects at the former Akzo Nobel facility. The developer should be required to obtain a listing of all radioisotopes used at the facility. The cost of site testing should be included in total project cost estimates. The time required for site testing should be included in total project time estimates.

-The developer should perform a soil vapor intrusion study to assess the presence of volatile chemicals, given the site's history.

-The developer should explain how contaminated soil will be treated or disposed of, and set forth whether the cost of removal has been factored in to projections.

VILLAGE OF ARDSLEY

- Certification from USEPA and NYSDEC should be obtained verifying that all site remediation has been performed prior to commencement of any construction. This should include verification that all underground tanks have been removed and site remediation at former tank locations has been performed appropriately.
- The DEIS needs to consider proposed sources of energy supply to the site, and determine the feasibility and safety of each. For example, there is no gas service to the site. Is a gas line under consideration and what approvals would be required? What are the safety and environmental risks?
- The impacts of the recently erected DPW buildings and the Chauncey Square project on the Saw Mill River floodplain must be considered in the drainage analysis, along with the compounding effects of the proposed project.
- Describe where stormwater will be redirected to, and how it will be treated and contained.
- Given recent storm activity and models of climate change, all stormwater analyses should use 100-year storm as the base criterion.
- Given the proximity to the floodplain, analysis of mitigations should include a reduction in stormwater runoff from the site.
- Is the site covered under the Dobbs Ferry SPDES or did the site have its own SPDES? What is the feasibility of creating a separate stormwater district?
- All bridge reports for existing bridges on Lawrence Street and all vehicle access routes should be examined. The ratings and restrictive weight limits for the bridges should be set forth in the DEIS, and an assessment of their capacity for construction vehicles and anticipated commercial traffic should be included.
- A flooding study should be produced for the culverts in and around the site and a determination of the need for increase in cross-sectional area of the culvert.
- The project's impacts on neighboring wetlands and disturbance of steep slopes should be assessed.
- The statement that liquid effluent will be conveyed off site to inadequate capacity needs explanation and examination.
- If the hotel and supermarket will located be on the site of the former research lab building, explain the testing and precautions that will be undertaken to ensure the lack of contamination and long-term health impacts on a food store and building used for residential purposes.
- Was a formal SHPO (State Historic Preservation Office) review conducted to insure that there is no historic site in need of preservation?

VILLAGE OF ARDSLEY

- Examine the effects of the project on the view shed for Hunters Run residents.
- More than 1100 gallons of petroleum or chemical products are to be stored on the site. This should be examined. Are underground tanks being installed? What permits will be required? What will the impacts be on the soil, groundwater and public health?

Community Facilities and Services (Section V (J) (1))

- The EIS should make realistic assessments of the long-term costs of providing services to the project by Dobbs Ferry and Ardsley, including the costs and impacts if any municipal services initially provided by the developer should fall back on the municipalities, either by default or by agreement.

School Impacts (Section V (J) (2))

- In examining the school impacts, the EIS should examine potential clusters in school age children: if the demographics are such that families or single parents with school-age children occupy the residential units in greater than anticipated numbers or if there is a bunching of children within an age group, the impacts on the School District may be exacerbated.

Other considerations:

The following should be considered and the impacts on the project assessed:

-Affordable Housing: The EIS must consider what impacts the Westchester County settlement with the Federal government regarding affordable housing will have on this project:

- will an affordable housing component be required?
- irrespective of the settlement, should there be an affordable housing component?
- will Dobbs Ferry attempt to integrate lower income residents (and non-residents), including lower income (stay-in-place) elderly into the housing component?
- how would affordable housing affect tax revenue assumptions?

- Dobbs Ferry Vision Plan: Describe the compatibility of the project with the Dobbs Ferry Vision Plan, and specifically with the following goals, recommendations, values and principles enunciated in the Vision Plan:

- Every neighborhood should benefit from protections against: inappropriate intensification, preservation of open space and restrictions on thru-traffic on residential roads
- That future land use and development should be consistent with existing Village scale
- No out-of-scale development

VILLAGE OF ARDSLEY

- Protect the character of the Village

- That the following are among the things that are part of the Village's identity: generous open spaces, a traditional downtown, an easily walkable downtown, not dependent on an automobile for access to life's essentials

- Cultural and housing diversity

- Main/Cedar should be preserved as a place to meet, eat and shop

- Promote a safer and more attractive Gateway

- Promote vibrant Riverfront Parks and connections

- Sustainable community to support a sustainable lifestyle

With respect to Chauncey Park:

- Respect the green corridor along the Parkway and its non-sprawl character

- Unprotected Greenbelt a concern

- Isolation from the Village is a concern

- Unprotected space has steep slopes, rock outcroppings and environmental constraints

- The DPW facility is not a good neighbor for development: it creates truck traffic, noise from vehicles backing up and stores materials that are not particularly attractive

- Priorities for Chauncey Park include, among others:

- preserving remaining green space

- develop mixed office/commercial and health care, and allow retail only by special permit

- promote commercial uses in existing buildings as, for example, an "office incubator"

- encourage commercial uses that do not generate traffic on nearby residential streets

- Non-integrated Uses: The developer's statement says that the project contains the "types of uses that cannot be integrated into the existing downtown of DF." Specify those uses and explain the reasons they cannot be integrated into the downtown area.

VILLAGE OF ARDSLEY

-New Urbanism and Sustainable Architecture: How does the project meet the principles of restoration and adaptive reuse of properties, and principles of new urbanism and sustainable architecture?

-Green Building Practices: Identify the uses of green building practices, the costs and environmental impacts.

-State Mandated Cap on Tax Levies: The State Senate has passed the Governor's proposal of a 2% cap on annual increases in tax levies. This means that the difference between the Village's expenditures and non-property tax revenues cannot increase by more than 2%. The fact that the project may add to property tax revenues does not ameliorate the limitations fixed on levy increases. The EIS should assess the effect of this proposal, if it becomes law, as the Village of Dobbs Ferry would need to increase expenditures for services to the project.

Other interested agencies to be added for notice and comment purposes:

- Dobbs Ferry Conservation Advisory Board
- NYS Department of Transportation
- Westchester County Department of Transportation
- Westchester County Department of Planning
- Town of Greenburgh Department of Community Development and Conservation
- Operators of Beeline Bus routes